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Chapter 7 Trustee for Spectrum Link Inc.
7

8
9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **LOS ANGELES DIVISION**

12 In re:

13 SPECTRUM LINK, INC.,

14 Debtor.

Case No. 2:21-bk-16403-VZ

Chapter 7

CHAPTER 7 TRUSTEE'S MOTION FOR ORDER: (1) AUTHORIZING SALE OF VEHICLES TO MARILYN ADJANGBA, SUBJECT TO OVERBID; (2) APPROVING PROPOSED OVERBID PROCEDURES; (3) APPROVING THE SALE FREE AND CLEAR OF ANY LIENS, INTERESTS, AND ENCUMBRANCES UNDER 11 U.S.C. § 363(f), (4) DEEMING THE BUYER TO BE A GOOD FAITH PURCHASER UNDER 11 U.S.C. § 363(m); AND (5) WAIVING THE FOURTEEN-DAY STAY PRESCRIBED BY FRBP 6004(h); MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF HOWARD M. EHRENBURG AND MARILYN ADJANGBA IN SUPPORT THEREOF

[11 U.S.C. §§ 363(b)(1) and (f);
Fed. R. Bankr. P. 6004; LBR 6004-1]

Hearing Information:

Date: January 25, 2022

Time: 11:00 a.m.

Place: Courtroom 1368

Roybal Federal Building & Courthouse
255 East Temple Street
Los Angeles, California 90012

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1 **TO THE HONORABLE VINCENT P. ZURZOLO, UNITED STATES BANKRUPTCY**
2 **JUDGE; THE DEBTOR; THE OFFICE OF THE UNITED STATES TRUSTEE; AND ANY**
3 **POTENTIAL OVERBIDDERS:**

4 **MOTION**

5 Howard M. Ehrenberg, the duly appointed and acting Chapter 7 trustee ("Trustee") of the
6 bankruptcy estate ("Estate") of the above-captioned debtor ("Debtor"), hereby submits his "*Chapter*
7 *7 Trustee's Motion For Order: (1) Authorizing Sale Of Vehicles To Marilyn Adjangba, Subject To*
8 *Overbid; (2) Approving Proposed Overbid Procedures; (3) Approving The Sale Free And Clear Of*
9 *Any Liens, Interests, And Encumbrances Under 11 U.S.C. § 363(f); (4) Deeming The Buyer To Be*
10 *A Good Faith Purchaser Under 11 U.S.C. § 363(m); And (5) Waiving The Fourteen-Day Stay*
11 *Prescribed By FRBP 6004(H); Memorandum Of Points And Authorities; Declarations Of Howard*
12 *M. Ehrenberg And Marilyn Adjangba In Support Thereof*" ("Motion") and respectfully represents
13 as follows:

14 The Trustee seeks an order approving the sale ("Sale") of the following property of the
15 Estate: (1) 2017 Ford Connect Van, license plate 77880G2, VIN ending -27318 ("2017 Ford Van"),
16 (2) 2012 Ford F-F150 pickup truck, license plate 79084B2, VIN ending -82571 ("2012 Ford
17 Truck"), and (3) 2014 Ford Connect Van, license plate 56186R2, VIN ending -33270 ("2014 Ford
18 Van") (the three vehicles, individually, a "Vehicle," and collectively, the "Vehicles").

19 The Trustee has agreed to sell the Vehicles to Marilyn Adjangba ("Ms. Adjangba" or
20 "Buyer") for a total price of \$20,000.00 ("Purchase Price"), or alternatively, to such other interested
21 bidder who may submit a higher offer to purchase any or all of the Vehicles at the hearing on the
22 Motion. The Trustee accepted the offer of \$10,000.00 for the 2017 Ford Van, \$6,000.00 for the
23 2012 Ford Truck, and \$4,000.00 for the 2014 Ford Van. The Vehicles are being sold individually,
24 not as a lot, so the sale of each Vehicle is subject to individual overbid. A copy of the registration
25 and photos for each Vehicle is attached hereto as **Exhibit 1** for the 2017 Ford Van, **Exhibit 2** for
26 the 2012 Ford Truck, and **Exhibit 3** for the 2014 Ford Van. The Sale of the Vehicles does not
27 include any other personal property in the photographs (i.e., ladders, tools, etc.) included in Exhibits
28 1-3.

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The Vehicles are being sold on an “as is, where is” basis, with no warranties, recourse, contingencies, or representations, express or implied, of any kind. The Trustee and the Estate take no responsibility for the collection and/or removal of the Vehicles and that the cost of doing so, if any, is that of the Buyer. The sale of the Vehicles will be sold free and clear of any liens, interests, or encumbrances, including the liens held by the Employment Development Department (“EDD”) and The 3250 Wilshire Blvd. Partners (“Wilshire Landlord”) (the EDD and the Wilshire Landlord's liens, collectively, the “Disputed Liens”). The Disputed Liens will not attach to the net sale proceeds from the Sale of the Vehicles.

This Sale of each Vehicle is subject to overbid and the Trustee requests that the Court adopt the overbid procedures described below. The Trustee also seeks an order deeming the Buyer to be a good-faith purchaser under 11 U.S.C. § 363(m), and waiving the fourteen (14) day stay prescribed by Federal Rule of Bankruptcy Procedure 6004(h) to allow the Buyer to immediately close the sale and take possession of the Vehicles. In the event of any subsequent successful overbidder, the Trustee will seek the same relief as to the successful overbidder.

PROPOSED OVERBID PROCEDURES

Other potential buyers, subject to prior qualification by the Trustee, may submit overbids at the Sale hearing so long as the procedures described herein are met. If an overbidder does appear, the Trustee requests that the Court adopt the following overbid procedures (“Overbid Procedures”):

1. Intent To Bid And Overbid Amount

Any party wishing to bid on any of the Vehicles (“Overbidder”) shall advise the Trustee of its intent to bid and the amount of the initial overbid which must be at least \$1,000.00 more than the current selling price of \$10,000.00 for the 2017 Ford Van, \$6,000.00 for the 2012 Ford Truck, and \$4,000.00 for the 2014 Ford Van (“Initial Overbid”), by no later than 12:00 p.m. one (1) business day before to the hearing on this Motion (“Overbid Deadline”). The Overbidder will further provide proof of the Overbidder's financial ability to perform as discussed below. In his absolute sole discretion and business judgment, the Trustee shall have the right to accept additional overbids submitted prior to the Sale hearing but after the Overbid Deadline. Any subsequent overbids submitted after the Initial Overbid will be in increments of not less than \$250.00.

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1 **2. Payment Of Deposit**

2 The Buyer, and any Overbidder, shall provide the Trustee with a cashier's check, payable to
3 "Howard M. Ehrenberg, Chapter 7 Trustee of the Bankruptcy Estate of Spectrum Link, Inc." in the
4 amount of \$2,500.00 ("Deposit"). The Deposit must be delivered so that it is received by the Trustee
5 by no later than the Overbid Deadline. Deposits should be mailed to Howard M. Ehrenberg, Chapter
6 Trustee, 333 South Grand Avenue, Suite 3400, Los Angeles, CA 90071. The Trustee will receive the
7 Buyer's Deposit prior to the Sale hearing. The Buyer's Deposit is non-refundable unless the Buyer is
8 not deemed to be the "Winning Bidder" at the auction for any of the Vehicles as that phrase is defined
9 below. Overbidders who are not deemed to be the Winning Bidder shall have their Deposit refunded
10 to them unless the Overbidders agree to act as the Backup Bidder (defined below). The Deposit will
11 be credited to the Winning Bidder's, or Backup Bidder's, final winning bid amount. A separate
12 Deposit is not required for each of the Vehicles if the Overbidder intends to bid on more than one (1)
13 of the Vehicles.

14 **3. Evidence Of Financial Ability To Perform**

15 Any Overbidder must provide the Trustee with evidence of the proposed Overbidder's
16 financial ability to pay the full amount of the Initial Overbid so that such evidence is received by
17 the Trustee no later than the Overbid Deadline. In his absolute sole discretion and business
18 judgment, the Trustee shall have the right to qualify an Overbidder to bid at the Sale hearing by
19 determining whether the Overbidder has provided sufficient proof of financial ability to perform.

20 **4. Auction**

21 All parties who have submitted timely bids and otherwise satisfied the foregoing
22 requirements will be able to participate in an auction to be conducted at the hearing on the Motion
23 as is necessary in order to increase their bid. As stated previously, the Initial Overbid will be in the
24 amount of at least \$11,000.00 for the 2017 Ford Van, \$7,000.00 for the 2012 Ford Truck, and
25 \$5,000.00 for the 2014 Ford Van and any subsequent overbids will be in increments of \$250.00.

26 The Trustee will request authority to sell each of the Vehicles to the Buyer, or any successful
27 Overbidder with the highest overbid ("Winning Bidder"). The Trustee will also seek authority to
28 designate the second highest bidder as the back-up bidder ("Backup Bidder") and to sell each of the

Vehicles to the Backup Bidder if the Winning Bidder fails to perform. To be considered the "highest overbid," any overbid must be on the same terms and conditions as described herein.

5. Tender Of Balance Of Purchase Price

The Winning Bidder for each of the Vehicles must tender the total purchase price, minus the Deposit previously received, to the Trustee via cashier's check within seven (7) calendar days following entry of the order approving the Sale of the Vehicles to such buyer. If the Winning Bidder for a Vehicle fails to tender the balance of the total purchase price by such date, that bidder's entire Deposit shall be forfeited to the Trustee, and the Backup Bidder shall tender the balance of the Backup Bidder's bid, minus the Backup Bidder's Deposit previously received, to the Trustee via cashier's check within seven (7) calendar days following the Trustee's delivery of notice to the Backup Bidder that the Winning Bidder failed to perform. If the Backup Bidder fails to tender the balance of the total purchase price within seven (7) calendar days after receiving notice from the Trustee that the Winning Bidder has failed to perform, the Backup Bidder's Deposit shall be forfeited to the Trustee. The Trustee shall have the sole discretion to extend the seven (7) calendar day payment deadline described herein for the Winning Bidder or the Backup Bidder.

6. Agreement To Terms And Overbid Procedures

Any Overbidder's tender of the Deposit to the Trustee shall serve as that Overbidder's agreement with these proposed Overbid Procedures and the terms of the Sale of the Vehicles discussed herein.

This Motion is made pursuant to 11 U.S.C. §§ 363(b)(1) and (f), Federal Rule of Bankruptcy Procedure 6004, and LBR 6004-1 on the grounds that, based on the Trustee's sound business justification, the Trustee believes the Sale of the Vehicles as set forth herein is in the best interests of the Estate. The Sale will provide the Estate with a guaranteed total return of at least \$20,000.00 with no delay in payments. The proposed Sale is subject to overbid thereby allowing the Estate to achieve a higher price for the Vehicles in the event another party believes the Vehicles have more value.

This Motion is based on the accompanying Memorandum of Points and Authorities, the Declarations of Howard M. Ehrenberg and Ms. Adjangba, the concurrently-filed Local Rule Form

6004-2, the record in this case, all facts and documents that are judicially noticeable and any other
or further evidence or argument presented to the Court prior to or at the hearing on the Motion.

CONCLUSION

WHEREFORE, the Trustee respectfully requests that this Court enter an order:

1. Granting the Motion;
2. Approving the Overbid Procedures proposed herein;
3. Authorizing the Trustee to sell the Vehicles to Buyer, or alternatively, to any higher
Overbidder, in accordance with the Overbid Procedures described herein;
4. Approving the Sale of the Vehicles free and clear of any liens, interests, and
encumbrances, including the Disputed Liens, under 11 U.S.C. § 363(f),
5. Deeming the Buyer, of any successful Overbidder, of any of the Vehicles to be a
good-faith purchaser pursuant to 11 U.S.C. § 363(m) for purposes of this Sale;
6. Waiving the fourteen (14) day stay proscribed by FRBP 6004(h);
7. Authorizing the Trustee to execute any documents as necessary to effectuate this
Sale; and
8. Providing such other and further relief as the Court deems proper.

DATED: January 4, 2022

Respectfully submitted,

/s/Steve Burnell

Mark S. Horoupian

Steve Burnell

Attorneys for Howard M. Ehrenberg,

Chapter 7 Trustee for the Bankruptcy Estate of
Spectrum Link, Inc.

MEMORANDUM OF POINTS AND AUTHORITIES¹

I.

INTRODUCTION

The Trustee seeks an order approving the Sale of the Vehicles to Buyer. A copy of the registration and photos for each of the Vehicles is attached hereto as Exhibits 1-3. The Trustee submits that the price obtained for the Vehicles is fair market value and that the Sale is in the best interests of the Estate. The Trustee believes all prerequisites for approval of the Sale under applicable provisions of the Bankruptcy Code have been satisfied and urges the Court to grant the Motion.

II.

BACKGROUND FACTS

On August 11, 2021 ("Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code ("Bankruptcy Code") in the United States Bankruptcy Court, Central District of California, Los Angeles Division, initiating this bankruptcy case, Case No. 2:21-bk-16403-VZ ("Bankruptcy Case").

The Debtor filed its initial schedules on August 25, 2021 and listed approximately \$364,000 in personal property assets, \$33,000 in secured claims, \$129,000 in priority unsecured claims, and \$12.7 million in general unsecured claims [Docket no. 25] (all figures rounded). The Debtor's schedule E/F was subsequently amended on October 7, 2021 and the amount of general unsecured claims against the Estate increased to approximately \$23 million [Docket. no. 64].

By order entered November 4, 2021 [Docket no. 91], the Court granted the Office of the United States Trustee's ("OUST") Motion Under 11 U.S.C. § 1112(b)(1) to Convert, Dismiss, or Appoint a Chapter 11 Trustee With an Order Directing Payment of Quarterly Fees And For Judgment Thereon [Docket no. 57]. The Trustee was appointed as chapter 11 trustee by the OUST

¹ Terms not defined herein shall have the same meaning ascribed to them in the foregoing Motion.

1 the same day, and the Trustee's appointment was confirmed by the Court's subsequent order entered
2 on November 10, 2021 [Docket no. 96].

3 After determining that there was no reasonable likelihood that the Debtor could be
4 reorganized, the Trustee has moved to convert the Bankruptcy Case to chapter 7 [Docket no. 106].
5 The order granting the Trustee's motion and converting the case to chapter 7 was entered on
6 December 22, 2021 [Docket no. 121], and the Trustee was reappointed as the interim chapter 7
7 trustee on December 23, 2021 [Docket no. 122]. The 341(a) meeting of creditors is set for January
8 24, 2022.

9 The Debtor listed the Assets on Line 47 of its Schedule B filed on August 25, 2021, a true
10 and correct copy of which is attached hereto as **Exhibit 4**. The Debtor was the registered owner of
11 each of the Vehicles on the Petition Date.² See Exhibits 1-3.

12 Ms. Adjangba is the principal and CEO of the Debtor. She became CEO after her brother
13 and former CEO of the Debtor, Bernard Mayfield ("Mr. Mayfield"), passed away in April 2021.
14 Ms. Adjangba, in her individual capacity, has offered to purchase the Vehicles as follows:
15 \$10,000.00 for the 2017 Ford Van, \$6,000.00 for the 2012 Ford Truck, and \$4,000.00 for the 2014
16 Ford Van, with the understanding that the Sale is subject to overbid. See Declaration of Ms.
17 Adjangba attached hereto. The Trustee determined that, under the circumstances of this case, the
18 sale of the Vehicles for the total Purchase Price of \$20,000.00, subject to overbid for each Vehicle,
19 is the best offer he could obtain for the Vehicles.

20 The Debtor scheduled a total of five (5) liens against the Vehicles located in California, four
21 (4) of which are purportedly held by the EDD and the fifth lien held by Wilshire Landlord. A true
22 and correct copy of the Debtor's Schedule D filed on August 25, 2021 is attached hereto as **Exhibit**
23 **5**. The Trustee's search of the California Secretary of State Office's ("CA SOS") records indicates
24 that a total of six (6) liens were recorded by the EDD against the Debtor's personal property, three
25 (3) of which remain active including one (1) that was recorded during the 90-day preference period
26

27 ² Schedule B erroneously listed the model years for the 2012 Ford Truck as a "2016," and for the
28 2014 Ford Van as a "2013." The registration cards attached as Exhibits 1-3 confirm the correct
model years for the Vehicles.

1 before the Petition Date. *See* true and correctly copy of the LexisNexis UCC Filings search results
2 for the Debtor attached hereto as **Exhibit 6**. The EDD's own proof of claim admits, however, that
3 the EDD only holds priority and general unsecured claims totaling \$17,507.94 for the same tax
4 period referenced in the schedules. *See* true and correct copy of the EDD's Proof of Claim No. 11
5 filed on Sep. 28, 2021 attached hereto as **Exhibit 7**.

6 With regard to the Wilshire Landlord, it filed a Notice of Judgment Lien with the CA SOS
7 on May 23, 2021 in the amount of \$25,147.39. *See* Exhibit 4. Because the Wilshire Landlord's
8 judgment lien was recorded within the 90-day preference period before the Petition Date, it is also
9 subject to avoidance under 11 U.S.C. § 547.

10 Notwithstanding Ms. Adjangba's status as the CEO of the Debtor and sister of Mr. Mayfield,
11 the Sale of the Vehicles was negotiated at arm's length by the Trustee. There is no fraud, collusion,
12 or any other insider transactions present here (other than as represented), and the Buyer received no
13 special treatment or consideration from the Trustee. The Sale will be publicized on the Bankruptcy
14 Court's website, Inforuptcy, the National Association of Bankruptcy Trustees, and notice will be
15 provided to all creditors. The Trustee has accepted the offer and the net benefit to the unsecured
16 creditors of the Estate is best realized through the proposed Sale of the Vehicles.

17
18 **III.**

19 **SUMMARY OF PROPOSED SALE TERMS**

20	Seller:	The Trustee
21	Buyer:	Marilyn Adjangba
22	Assets To Be Sold:	2017 Ford Van, 2012 Ford Truck, 2014 Ford Van
23	Purchase Price:	\$10,000.00 for the 2017 Ford Van, \$6,000.00 for the 2012 Ford
24		Truck, and \$4,000.00 for the 2014 Ford Van
25	Auction:	The Sale is subject to the Overbid Procedures described in the Motion.
26		In the event a qualified Overbidder submits an overbid, the auction
27		will take place at the same date, time, and location as the hearing on
28		this Motion.

Representations: The Vehicles are being sold on an “as is, where is” basis, with no warranties, recourse, contingencies, or representations, express or implied, of any kind. The Estate takes no responsibility for the collection and/or removal of the Vehicles and the cost of doing so, if any, is that of the Buyer. The Sale of the Vehicles does not include any other personal property in the Vehicles (i.e., ladders, tools, etc.) seen in the photographs attached as Exhibits 1-3.

Prepetition Interests: The Vehicles are being sold free and clear of all liens, interests, and encumbrances, including the Disputed Liens, under 11 U.S.C. § 363(f). The Disputed Liens will not attach to the net sale proceeds.

IV.

THE PROPOSED SALE IS IN THE BEST INTERESTS OF THE ESTATE

Under 11 U.S.C. § 363, a trustee is empowered to sell assets of the estate outside the ordinary course of business “after notice and a hearing.” The standards for approval of a sale pursuant to 11 U.S.C. § 363(b)(1) require that the proponent of the sale establish that: “(1) a sound business purpose exists for the sale; (2) the sale is in the best interest of the estate, *i.e.*, the sale price is fair and reasonable; (3) notice to creditors was proper; and (4) the sale is made in good faith.” *In re Slates*, 2012 WL 5359489 (B.A.P. 9th Cir. Oct. 31, 2012) (unpublished) (*citing In re Wilde Horse Enters., Inc.*, 136 B.R. 830, 841 (Bankr. C.D. Cal. 1991); *Comm. of Equity Sec. Holders v. Lionel Corp. (In re Lionel Corp.)*, 722 F.2d 1063, 1069 (2d Cir. 1983)). The Trustee’s proposed Sale of the Vehicles meets these requirements.

A. Sound Business Purpose

The decision to sell property out of the ordinary course of a debtor’s business must be based on the reasonable business judgment of the debtor. *In re Continental Air Lines, Inc.*, 780 F.2d 1223, 1226 (5th Cir. 1986); *In re Lionel Corp.*, 722 F.2d 1063, 1070 (2d Cir. 1983). In determining whether the business purpose is justified under 11 U.S.C. § 363(b)(1), bankruptcy courts apply a flexible, case-by-case approach. *See In re Walter*, 83 B.R. 14, 19 (B.A.P. 9th Cir. 1988) (“the

1 bankruptcy judge should consider all salient factors pertaining to the proceeding and, accordingly,
2 act to further the diverse interests of the debtor, creditors and equity holders, alike.”) (quoting
3 *Continental Air*, 780 F.2d at 1226). The court should approve a sale of property under 11 U.S.C.
4 § 363(b)(1) if the trustee has established a sound business purpose for the proposed transaction.
5 *Walter*, 83 B.R. at 16; *Wilde Horse*, 136 B.R. at 841 (Bankr. C.D. Cal. 1991). The business
6 judgment standard is deferential. *In re Lahijani*, 325 B.R. 282, 289 (B.A.P. 9th Cir. 2005)
7 (“Ordinarily, the position of the trustee is afforded deference, particularly where business judgment
8 is entailed in the analysis or where there is no objection.”).

9 The facts reflect that the Trustee’s decision to sell the Vehicles is supported by sound business
10 judgment because the Estate will receive a total of at least \$20,000 (or any final price achieved at
11 an auction) for the Vehicles. The sound business purpose for the Sale is also reflected by the fair
12 and reasonable price that the Estate is receiving for these assets. There is also the potential that a
13 higher return can be achieved for the Estate since the Sale is subject to overbid for each of the
14 Vehicles, which will further confirm that a fair and reasonable price is being received by the Estate.
15 With no need for the Vehicles in the Debtor's now-ceased business operations, and in furtherance
16 of the Trustee's duties under 11 U.S.C. § 704(a)(1) to "collect and reduce to money the property of
17 the estate," the Sale of the Vehicles is in the best interest of the Estate and a valid exercise of the
18 Trustee's business judgment.

19 **B. Reasonable Purchase Price**

20 Since the Sale will be subject to the Overbid Procedures, the Purchase Price, or any resulting
21 higher offer received, will represent fair market value for the Vehicles. The Purchase Price is also
22 within the range of values that Trustee obtained during the course of his investigation from a private
23 auctioneer and online resources, including Kelly Blue Book. See true and correct copy of Kelly
24 Blue Book online valuation for the Vehicles attached hereto as collective **Exhibit 8**. The Purchase
25 Price for the Vehicles is reasonable in light of the Vehicle conditions, which have been used as
26 commercial work vehicles for the last several years. The mileage for the 2017 Ford Van is
27 approximately 119,529 miles and the mileage for the 2012 Ford Truck is approximately 146,996.
28 And as is evident in the photographs included with Exhibits 1-3, each of the Vehicle is "wrapped"

1 with advertisement for the Debtor's business and will be an additional cost to any purchaser to
2 remove the wraps. As a result, and as discussed above, the Purchase Price is fair, reasonable,
3 market-tested and in the best interests of the Estate.

4 **C. Notice of the Sale Is Proper**

5 In compliance with 11 U.S.C. § 363(b)(1), FRBP 2002(a)(2), and 6004(a), the Trustee will
6 serve notice of the Sale to the Debtor, the United States Trustee, and all creditors. The notice of the
7 Sale will also be published on the Bankruptcy Court's website, Inforuptcy, and the National
8 Association of Bankruptcy Trustees website. Accordingly, notice of the Sale is proper.

9 **D. The Sale Was Negotiated In Good Faith**

10 As further detailed in the attached declarations of the Trustee and the Buyer, notwithstanding
11 the fact that the Buyer is the principal and CEO of the Debtor and the sister of Mr. Mayfield, this
12 Sale was negotiated at arms-length and no special consideration or treatment given to the Buyer by
13 the Trustee. The Buyer has offered to purchase the Vehicles in her individual capacity. There was
14 no prior relationship between the Trustee and the Buyer. The Overbid Procedures will confirm that
15 fair market value is being received for each of the Vehicles, providing further evidence of the good
16 faith negotiations between the parties.

17 In sum, the Trustee has satisfied each of the elements governing the proposed Sale of the
18 Vehicles and has articulated sound business reasons for entering into and seeking consummation of
19 the Sale. The Court should therefore approve the Sale.

20 **E. The Sale of the Vehicles Should Be Approved Free and Clear of Any Liens,**
21 **Interests, and Encumbrances Under 11 U.S.C. § 363(f)**

22 Pursuant to 11 U.S.C. § 363(f), a trustee may sell assets of the estate free and clear of any
23 interest in such property of an entity other than the estate only if - (1) applicable non-bankruptcy
24 law permits sale of such property free and clear of such interest; (2) such entity consents; (3) such
25 interest is a lien and the price at which such property is to be sold is greater than the aggregate value
26 of all liens on such property; (4) such interest is in *bona fide* dispute; or (5) such entity could be
27 compelled, in legal or equitable proceedings, to accept a money satisfaction of such interest. This
28 section of the Bankruptcy Code has been interpreted to be in the disjunctive, rather than the

1 conjunctive. Thus, a trustee need only demonstrate that one of the elements of this section exists.
2 *In re Elliot*, 94 B.R. 343, 345 (Bankr. E.D. Pa. 1988).

3 In this case, the Vehicles may be sold free and clear of the Disputed Liens because two (2)
4 subsections of 11 U.S.C. § 363(f) are satisfied. First, the Disputed Liens are subject to a *bona fide*
5 dispute under 11 U.S.C. § 363(f)(4). Notwithstanding the liens recorded by the EDD with the CA
6 SOS, the EDD's own proof of claim admits that the EDD is unsecured and holds only priority and
7 general unsecured claims totaling \$17,507.94. Moreover, one (1) of those liens is subject to
8 avoidance as a preference. *See* Exhibit 7. And the lien held by the Wilshire Landlord is also subject
9 to avoidance under 11 U.S.C. § 547 as a preference since the lien was recorded within the 90-day
10 period prior to the Petition Date.

11 Furthermore, because the general rule is that a creditor secured by a vehicle perfects that
12 security interest with the California Department of Motor Vehicles, because neither the EDD nor
13 the Wilshire Landlord were listed as lienholders on the registration for the Vehicles, the Disputed
14 Liens are unperfected to the extent they even attached to the Vehicles. *See Simon v. Chrysler Credit*
15 *Corp. (In re Babaeian Transp. Co.)*, 206 B.R. 536, 543 (Bankr. C.D. Cal. 1997); Exhibits 1-3.

16 Moreover, because the failure to file any opposition by a party receiving notice of the Motion
17 may be deemed to be that party's consent to the relief requested under the Local Bankruptcy Rules,
18 there exists an additional ground for selling the Vehicles free and clear of any liens, interests, and
19 encumbrances under 11 U.S.C. § 363(f)(2) since any such party with such an interest in the Vehicles
20 receiving notice of the Sale has consented to the relief requested in the Sale if they do not file
21 opposition. *See* LBR 9013-1(h) ("...if a party does not timely file and serve documents, the court
22 may deem this to be consent to the granting or denial of the motion, as the case may be.").
23 Accordingly, the Vehicles may be sold free and clear of any liens, interests, and encumbrances under
24 11 U.S.C. § 363(f) and because there is no *prima facie* evidence that the EDD and the Wilshire
25 Landlord hold a validly perfected lien on the Vehicles, the Disputed Liens will not attach to the net
26 sale proceeds.

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F. Buyer Is a Good Faith Purchaser

Under 11 U.S.C. § 363(m), in relevant part, if a sale order is subsequently reversed or modified on appeal, such reversal or modification does not affect the validity of the sale if the purchase was a good faith purchaser and no stay pending appeal was obtained. Although the Bankruptcy Code does not define the term “good faith”, courts have found that a “good faith purchaser” is one who buys ‘in good faith’ and “for value”. *In re M Capital Corp.*, 290 B.R. 743, 746 (B.A.P. 9th Cir. 2003). “Typically, lack of good faith is shown by fraud, collusion between the purchaser and other bidders or the trustee, or an attempt to take grossly unfair advantage of other bidders”. *Id.* at 746-47. The burden of proof to show “good faith” is on the proponent of good faith or, in this case, the Trustee. *See id.* at 747.

Here, the Buyer should be deemed to be a good faith purchaser for purposes of this Sale under 11 U.S.C. § 363(m) because the Sale was negotiated in good faith. Notwithstanding the fact that the Buyer is the principal and CEO of the Debtor and the sister of Mr. Mayfield, this Sale was negotiated at arms-length and no special treatment or consideration was given to the Buyer. There was also no prior relationship between the Trustee and the Buyer. The Buyer is providing value in the form of for \$10,000.00 for the 2017 Ford Van, \$6,000.00 for the 2012 Ford Truck, and \$4,000.00 for the 2014 Ford Van. The Overbid Procedures will confirm that fair market value is being received for each of the Vehicles, providing further evidence of the good faith negotiations between the parties. Accordingly, because there are no facts raising the specter of bad faith, collusion, or calling into question the propriety of the Sale, the Court should deem the Buyer, or any similarly situated Overbidder, to be a good faith purchaser of the Vehicles under 11 U.S.C. § 363(m) for purposes of this Sale.

G. Waiver Of The Fourteen (14) Day Period For Effectiveness Of Sale Order

Rule 6004(h) provides that “An order authorizing the use, sale, or lease of property other than cash collateral is stayed until the expiration of 14 days after entry of the order, unless the court orders otherwise.” FRBP 6004(h). The legislative history to Rule 6004 provides:

The court may, in its discretion, order that Rule 6004(g) [now 6004(h)] is not applicable so that the property may be used, sold, or leased immediately in accordance with the order entered by the court.

Alternatively, the court may order that the stay under Rule 6004(g)
[now 6004(h)] is for a fixed period less than 10 [now 14] days.

Given the notice and full opportunity to object, respond, or participate in Overbid Procedures presented by this Motion, the Trustee believes that, unless there are objections to the Motion that are not consensually resolved, it is appropriate and good cause exists for the Court to order that Rule 6004(h) is not applicable, and the Vehicles may be sold immediately. Waiving the fourteen (14) day stay will allow the Buyer, or any successful Overbidder to take immediate possession of the Vehicles once the sale order is entered. Additionally, since the Vehicles are currently held in two (2) storage units, allowing the Buyer or successful Overbidder to take immediate possession of the Vehicles will provide such party the opportunity to determine whether to move the Vehicles out of the storage or make other arrangements with the storage unit owners. Accordingly, the Trustee requests that the Court authorize the Sale to be effectuated immediately upon entry of the order approving this Motion.

H. Tax Consequences

It is anticipated that there will no tax liability generated from the Sale because there will likely be no capital gains realized, or alternatively, any capital gain will be offset by the Debtor's other losses. Indeed, because the Vehicles have already been put in use, it is more than likely that the Estate will incur a loss for tax purposes since the Vehicles are very likely being sold at a price less than the Debtor's original cost basis. The Sale is therefore in the best interest of the Estate because the Estate will likely not suffer an adverse tax consequence from the Sale.

V.

CONCLUSION

For the reasons set forth above, the Trustee respectfully requests that this Court enter an order:

1. Granting the Motion;
2. Approving the Overbid Procedures proposed herein;
3. Authorizing the Trustee to sell the Vehicles to Buyer, or alternatively, to any higher Overbidder, in accordance with the Overbid Procedures described herein;

4. Approving the Sale of the Vehicles free and clear of any liens, interests, and encumbrances, including the Disputed Liens, under 11 U.S.C. § 363(f);
5. Deeming the Buyer, of any successful Overbidder, to be a good-faith purchaser pursuant to 11 U.S.C. § 363(m) for purposes of this Sale;
6. Waiving the fourteen (14) day stay proscribed by FRBP 6004(h);
7. Authorizing the Trustee to execute any documents as necessary to effectuate this Sale; and
8. Providing such other and further relief as the Court deems proper.

DATED: January 4, 2022

Respectfully submitted,

/s/Steve Burnell

Mark S. Horoupian

Steve Burnell

Attorneys for Howard M. Ehrenberg,
Chapter 7 Trustee for the Bankruptcy Estate of
Spectrum Link, Inc.

DECLARATION OF HOWARD M. EHRENBURG³

I, Howard M. Ehrenberg, declare as follows:

1. I am an individual over the age of eighteen (18) years old and I am the duly appointed, qualified and acting Chapter 7 trustee ("Trustee") of the bankruptcy estate ("Estate") for the debtor Spectrum Link, Inc. ("Debtor"). I submit the following declaration in my capacity as Chapter 7 trustee. Unless otherwise stated, the facts set forth in this declaration are personally known to me and if called as a witness, I could and would competently testify thereto.

2. I make and execute this declaration in support of the foregoing "*Chapter 7 Trustee's Motion For Order: (1) Authorizing Sale Of Vehicles To Marilyn Adjangba, Subject To Overbid; (2) Approving Proposed Overbid Procedures; (3) Approving The Sale Free And Clear Of Any Liens, Interests, And Encumbrances Under 11 U.S.C. § 363(f); (4) Deeming The Buyer To Be Good Faith Purchaser Under 11 U.S.C. § 363(m); And (5) Waiving The Fourteen-Day Stay Prescribed By FRBP 6004(H)*" ("Motion").

3. On August 11, 2021 ("Petition Date"), the Debtor filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code in the United States Bankruptcy Court, Central District of California, Los Angeles Division, initiating this bankruptcy case, Case No. 2:21-bk-16403-VZ.

4. The Debtor filed its initial schedules on August 25, 2021 and listed approximately \$364,000 in personal property assets, \$33,000 in secured claims, \$129,000 in priority unsecured claims, and \$12.7 million in general unsecured claims [Docket no. 25] (all figures rounded). The Debtor's schedule E/F was subsequently amended on October 7, 2021 and the amount of general unsecured claims against the Estate increased to approximately \$23 million [Docket. no. 64].

5. By order entered November 4, 2021 [Docket no. 91], the Court granted the Office of the United States Trustee's ("OUST") Motion Under 11 U.S.C. § 1112(b)(1) to Convert, Dismiss, or Appoint a Chapter 11 Trustee With an Order Directing Payment of Quarterly Fees And For

³ Terms not defined herein shall have the same meaning ascribed to them in the foregoing Motion and/or Memorandum of Points and Authorities.

1 Judgment Thereon [Docket no. 57]. The Trustee was appointed as chapter 11 trustee by the OUST
2 the same day, and the Trustee's appointment was confirmed by the Court's subsequent order entered
3 on November 10, 2021 [Docket no. 96].

4 6. After determining that there is no reasonable likelihood that the Debtor can be
5 reorganized, the Trustee has moved to convert the Bankruptcy Case to chapter 7 [Docket no. 106].
6 The order granting the Trustee's motion and converting the case to chapter 7 was entered on
7 December 22, 2021 [Docket no. 121], and the Trustee was reappointed as the interim chapter 7
8 trustee the next day [Docket no. 122]. The 341(a) meeting of creditors is set for January 24, 2022.

9 7. The Trustee seeks an order approving the sale ("Sale") of the following property of
10 the Estate: (1) 2017 Ford Connect Van, license plate 77880G2, VIN ending -27318 ("2017 Ford
11 Van"), (2) 2012 Ford F-F150 pickup truck, license plate 79084B2, VIN ending -82571 ("2012 Ford
12 Truck"), and (3) 2014 Ford Connect Van, license plate 56186R2, VIN ending -33270 ("2014 Ford
13 Van") (the three vehicles, individually, a "Vehicle," and collectively, the "Vehicles"). A copy of
14 the registration and photos for each of the Vehicles is attached hereto as **Exhibit 1** for the 2017 Ford
15 Van, **Exhibit 2** for the 2012 Ford Truck, and **Exhibit 3** for the 2014 Ford Van.

16 8. The Debtor listed the Vehicles on Line 47 of its Schedule B filed on August 25, 2021,
17 a true and correct copy of which is attached hereto as **Exhibit 4**. The Debtor was the registered
18 owner of each of the Vehicles on the Petition Date.⁴ See Exhibits 1-3.

19 9. Ms. Adjangba is the principal and CEO of the Debtor. I am informed that she became
20 CEO after her brother and former CEO of the Debtor, Bernard Mayfield ("Mr. Mayfield"), passed
21 away in April 2021. Ms. Adjangba, in her individual capacity, has offered to purchase the Vehicles
22 as follows: \$10,000.00 for the 2017 Ford Van, \$6,000.00 for the 2012 Ford Truck, and \$4,000.00
23 for the 2014 Ford Van, with the understanding that the Sale is subject to overbid. See Declaration
24 of Ms. Adjangba attached hereto. The Trustee determined that, under the circumstances of this case,
25
26

27 ⁴ Schedule B erroneously listed the model years for the 2012 Ford Truck as a "2016," and for the
28 2014 Ford Van as a "2013." The registration cards attached as Exhibits 1-3 confirm the correct
model years for the Vehicles.

1 the sale of the Vehicles for the total Purchase Price of \$20,000.00, subject to overbid for each
2 Vehicle, is the best offer he could obtain for the Vehicles.

3 10. The Debtor scheduled a total of five (5) liens against the Vehicles located in
4 California, four (4) of which are purportedly held by the EDD and the fifth lien held by Wilshire
5 Landlord. A true and correct copy of the Debtor's Schedule D filed on August 25, 2021 is attached
6 hereto as **Exhibit 5**. The Trustee's search of the California Secretary of State Office's ("CA SOS")
7 records indicates that a total of six (6) liens were recorded by the EDD against the Debtor's personal
8 property, three (3) of which remain active including one (1) that was recorded during the 90-day
9 preference period before the Petition Date. *See* true and correctly copy of the LexisNexis UCC
10 Filings search results for the Debtor attached hereto as **Exhibit 6**. The EDD's own proof of claim
11 admits, however, that the EDD only holds priority and general unsecured claims totaling \$17,507.94
12 for the same tax period referenced in the schedules. *See* true and correct copy of the EDD's Proof
13 of Claim No. 11 filed on Sep. 28, 2021 attached hereto as **Exhibit 7**.

14 11. I have explained to Ms. Adjangba that I am selling the Vehicles on an "as is, where
15 is" basis, with no warranties, recourse, contingencies, or representations, express or implied, of any
16 kind. The Estate takes no responsibility for the collection and/or removal of the Vehicles and the
17 cost of doing so, if any, is that of the Buyer. The Sale of the Vehicles does not include any other
18 personal property in the Vehicles (i.e., ladders, tools, etc.) seen in the photographs attached as
19 Exhibits 1-3. I have further explained to the Buyer that the Estate takes no responsibility for the
20 collection and/or removal of the Vehicles and that the cost of doing so, if any, is that of the Buyer.

21 12. Notwithstanding Ms. Adjangba's status as the CEO of the Debtor and sister of Mr.
22 Mayfield, the sale of the Vehicles was negotiated at arm's length by me. There is no fraud,
23 collusion, or any other insider transactions present here (other than as represented), and the Buyer
24 received no special treatment or consideration from me. The Sale will be publicized on the
25 Bankruptcy Court's website, Inforuptcy, the National Association of Bankruptcy Trustees website,
26 and notice will be provided to all creditors. The net benefit to the unsecured creditors of the Estate
27 is best realized through the proposed Sale of the Vehicles
28

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LOS ANGELES, CALIFORNIA 90071
TEL 213.626.2311 • FAX 213.629.4520

1 13. I respectfully submit that the proposed Overbid Procedures are reasonable,
2 appropriate, satisfy the business judgment rule, and should be approved. I will receive the Buyer's
3 Deposit prior to the Sale hearing. To the extent the Court approves the Sale of the Vehicles to a
4 qualified Overbidder who then fails to close (for any reason other than a material breach by me), the
5 Overbidder's Deposit of \$2,500.00 will be forfeited to the Estate. The proposed Overbid Procedures
6 allow for an unsuccessful bidder to serve as the Backup Bidder in the event the Winning Bidder
7 fails to close; thereby providing the Estate with a form of "insurance" that I will be able to
8 consummate the sale of the Vehicles, even if the Winning Bidder fails to perform. Under these
9 circumstances, the Overbid Procedures and timetable established for the Sale of the Vehicles are
10 more than reasonable, will ensure competitive bidding, and should be approved.

11 14. The Purchase Price of the 2017 Ford Van for \$10,000.00, the 2012 Ford Truck for
12 \$6,000.00, and the 2014 Ford Van for \$4,000.00 is fair and reasonable. The Purchase Price for the
13 Vehicles is also within the range of values that I obtained during the course of my investigation from
14 a private auctioneer and online resources, including Kelly Blue Book. *See* true and correct copy of
15 Kelly Blue Book online valuation for the Vehicles attached hereto as collective **Exhibit 8**. The
16 Purchase Price for the Vehicles is also reasonable in light of the Vehicle conditions, which have
17 been used as commercial work vehicles for the last several years. The mileage for the 2017 Ford
18 Van is approximately 119,529 miles and the mileage for the 2012 Ford Truck is approximately
19 146,996. And as is evident in the photographs included with Exhibits 1-3, each of the Vehicle is
20 "wrapped" with advertisement for the Debtor's business and will be an additional cost to any
21 purchaser to remove the wraps.

22 15. The fair market value of the Vehicles will be further confirmed by the Overbid
23 Procedures. If there is any Overbid, the Estate will receive at least \$1,000.00 more than the Purchase
24 Price. I submit that the Initial Overbid of \$11,000.00 for the 2017 Ford Van, \$7,000.00 for the 2012
25 Ford Truck, and \$5,000.00 for the 2014 Ford Van are reasonable increase requirements, and will
26 ensure that the bidding process is not unduly "chilled." The subsequent incremental bids in the sum
27 of \$250.00 are designed to encourage bidding while at the same time avoiding the unnecessary delay
28 that would come with an unduly small incremental bid amount.

1 16. I am requesting that the Sale of the Vehicles by free and clear of any liens, interests,
2 and encumbrances, including the Disputed Liens, pursuant to 11 U.S.C. § 363(f). The Disputed
3 Liens are subject to a *bona fide* dispute under 11 U.S.C. § 363(f)(4). And the failure of any party
4 with an interest in the Disputed Liens to file opposition to the Motion, after receiving notice of the
5 Motion, may be deemed to be that party's consent to the relief requested in the Motion under LBR
6 9013-1(h) thereby meeting the requirements of 11 U.S.C. § 363(f)(2). Accordingly, two (2)
7 subsections of 11 U.S.C. § 363(f) are satisfied. I am also requesting that the Disputed Liens not
8 attach to the net sale proceeds because I have not reviewed any *prima facie* evidence that the EDD
9 and the Wilshire Landlord hold a validly perfected lien on the Vehicles.

10 17. Through my discussions with my proposed accountant, I anticipate that there will no
11 tax liability generated from the Sale because there will likely be no capital gains realized, or
12 alternatively, any capital gain will be offset by the Debtor's other losses. I am informed that the
13 Vehicles have been in use for approximately three (3) years, so it is more than likely that the Estate
14 will incur a loss for tax purposes since the Vehicles are very likely being sold at a price less than
15 original cost basis. The Sale is therefore in the best interest of the Estate because the Estate will
16 likely not suffer an adverse tax consequence from the Sale.

17 18. Given the notice and full opportunity to object, respond, or participate in Overbid
18 Procedures presented by this Motion, unless there are objections to the Motion that are not
19 consensually resolved, it is appropriate and good cause exists for the Court to waive the fourteen
20 (14) day stay imposed by FRBP 6004(h) so that the Vehicles may be sold immediately and the
21 Buyer, or any successful Overbidder, may take immediate possession of the Vehicles once the sale
22 order is entered. Since the Vehicles are currently held in two (2) storage units, allowing the Buyer
23 or successful Overbidder to take immediate possession will provide such party the opportunity to
24 determine whether to move the Vehicles out of the storage or make other arrangements with the
25 storage unit owners. Accordingly, I request that the Court authorize the Sale to be effectuated
26 immediately upon entry of the order approving this Motion.

27 ///

28 ///

1 19. In sum, in my business judgment, the Sale, which will generate at least \$20,000.00
2 of net proceeds for the Estate is in the best interest of the Estate.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed January 4, 2022, at Los Angeles, California.

5 

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7 _____
Howard M. Ehrenberg, Chapter 7 Trustee for the
8 bankruptcy estate of Spectrum Link, Inc.
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DECLARATION OF MARILYN ADJANGBA⁵

I, Marilyn Adjangba, declare as follows:

1. I am over the age of eighteen (18) years old. I have personal knowledge of the information contained herein and if called upon to testify, I could and would competently testify thereto.

2. I make this declaration in support of the foregoing "*Chapter 7 Trustee's Motion For Order: (1) Authorizing Sale Of Vehicles To Marilyn Adjangba, Subject To Overbid; (2) Approving Proposed Overbid Procedures; (3) Approving The Sale Free And Clear Of Any Liens, Interests, And Encumbrances Under 11 U.S.C. § 363(f); (4) Deeming The Buyer To Be Good Faith Purchaser Under 11 U.S.C. § 363(m); And (5) Waiving The Fourteen-Day Stay Prescribed By FRBP 6004(H)*" ("Motion").

3. I am the principal and CEO of the Debtor. I became CEO after my brother and former CEO of the Debtor, Bernard Mayfield ("Mr. Mayfield"), passed away in April 2021. I have offered to purchase, in my individual capacity, the following vehicles from the Trustee: (1) 2017 Ford Connect Van, license plate 77880G2, VIN ending -27318 ("2017 Ford Van"), (2) 2012 Ford F-F150 pickup truck, license plate 79084B2, VIN ending -82571 ("2012 Ford Truck"), and (3) 2014 Ford Connect Van, license plate 56186R2, VIN ending -33270 ("2014 Ford Van") (the three vehicles, individually, a "Vehicle," and collectively, the "Vehicles"). A copy of the registration and photos for each of the Vehicles is attached hereto as **Exhibit 1** for the 2017 Ford Van, **Exhibit 2** for the 2012 Ford Truck, and **Exhibit 3** for the 2014 Ford Van.

4. The Debtor listed the Assets on Line 47 of its Schedule B filed on August 25, 2021, a true and correct copy of which is attached hereto as **Exhibit 4**. The Debtor was the registered owner of each of the Vehicles on the Petition Date.⁶ See Exhibits 1-3.

⁵ Terms not defined herein shall have the same meaning ascribed to them in the foregoing Motion and/or Memorandum of Points and Authorities.

⁶ Schedule B erroneously listed the model years for the 2012 Ford Truck as a "2016," and for the 2014 Ford Van as a "2013." The registration cards attached as Exhibits 1-3 confirm the correct model years for the Vehicles.

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TEL 213.626.2311 • FAX 213.629.4520

1 5. The Trustee has explained to me, and I understand and agree that, the Trustee is
2 selling the Vehicles on an “as is, where is” basis, with no warranties, recourse, contingencies, or
3 representations, express or implied, of any kind. I further understand and agree that the Estate takes
4 no responsibility for the collection and/or removal of the Vehicles and the cost of doing so, if any,
5 is that of the Buyer. The Sale of the Vehicles does not include any other personal property in the
6 Vehicles (i.e., ladders, tools, etc.) seen in the photographs attached as Exhibits 1-3. The Trustee has
7 further explained to me that the Estate takes no responsibility for the collection and/or removal of
8 the Vehicles and that the cost of doing so, if any, is mine as the Buyer.

9 6. I understand that the Vehicles will be sold free and clear of any liens, interests, and
10 encumbrances, including the Disputed Liens, pursuant to 11 U.S.C. § 363(f).

11 7. I have reviewed the Overbid Procedures set forth in the Motion and I agree to adhere
12 to those procedures. I will be submitting my Deposit prior to the Sale hearing, and I have provided
13 proof of financial ability to perform to the Trustee.

14 8. I have not communicated with any other prospective or actual bidders in connection
15 with the purchase of the Vehicles. I have not communicated with any party in an effort to prevent
16 other parties from making an offer to acquire the Vehicles.

17 9. I have not entered into any arrangement that is not disclosed in the Motion relating
18 to the Sale. I have not entered into any agreement with any other officer, director, owner, or affiliate
19 of the Debtor regarding the Vehicles.

20 10. I have no prior relationship with the Trustee and I have not received any special
21 treatment or consideration from the Trustee during the at arms-length negotiations to purchase the
22 Vehicles.

23 ///

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26 ///

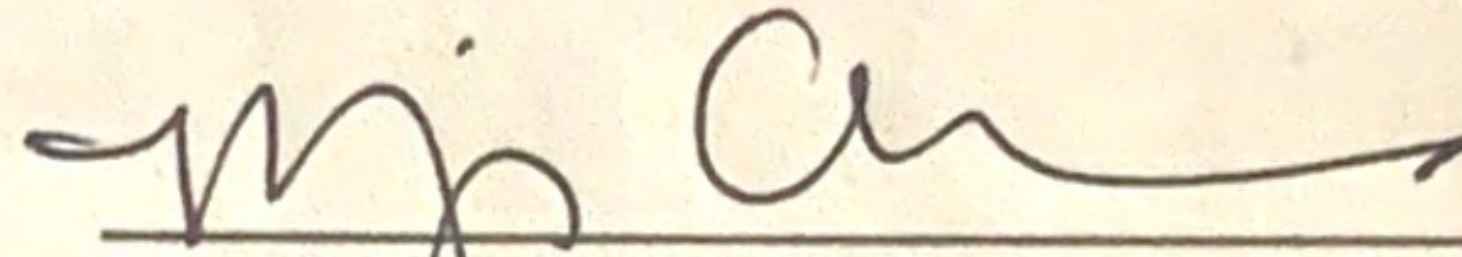
27 ///

28 ///

1 11. I request a waiver of the fourteen (14) day stay under FRBP 6004(h). The Vehicles
2 are currently held in two (2) storage units and immediate entry of the sale order will allow me to
3 take immediate possession of the Vehicles and determine whether to move the Vehicles out of the
4 storage or make other arrangements with the storage unit owners.

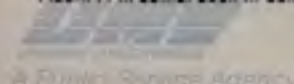
5 I declare under penalty of perjury that the foregoing is true and correct.

6 Executed January 3, 2022, at Schofield Barracks Army Base, Hawaii.

7
8 
9 Marilyn Adjangba

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EXHIBIT 1



REGISTRATION CARD VALID FROM: 06/30/2020 TO: 06/30/2021

MAKE	YR MODEL	YR 1ST SOLD	VLP CLASS	*YR	TYPE VEH	TYPE LIC	LICENSE NUMBER
FORD	2017	2017	CZ	2020	32V	31	77880G2
BODY TYPE MODEL	MP	MO	AX	WC	UNLADEN/G/CGW	VEHICLE ID NUMBER	
VN	G	CC	2	C	03520	NM0LS7E78H1327318	
TYPE VEHICLE USE	DATE ISSUED		CC/ALCO	DT FEE RECVD	PIC	STICKER ISSUED	
COMMERCIAL	03/27/21		30	03/27/21	9	C1642667	

PR EXP DATE: 06/30/2021

REGISTERED OWNER

SPECTRUM LINK INC
712 S LOST CANYON RD

ANAHEIM
CA

92808

MISC#: P26483

AMOUNT PAID
\$ 23.00

AMOUNT DUE
\$ 23.00
AMOUNT RECVD
CASH : 23.00
CHCK :
CRDT :



0026

H00 C04 6P 0002300 0027 CS H00 032721 31 77880G2 218



0027







EXHIBIT 2



REGISTRATION CARD VALID FROM: 09/30/2020 TO: 09/30/2021

MAKE	YR MODEL	YR 1ST SOLD	VLF CLASS	*YR	TYPE VEH	TYPE LIC	LICENSE NUMBER
FORD	2012	2012	DV	2017	32P	31	79084B2
BODY TYPE MODEL	NP	NO	AX	MC	UNLADEN/G/CGW	VEHICLE ID NUMBER	
PK	G	BI	2	E	05185	1FTFW1CF3CFC82571	
TYPE VEHICLE USE	DATE ISSUED		CC/ALCO	DT FEE RECVD	PIC	STICKER ISSUED	
COMMERCIAL	09/29/20		19	09/29/20	9	A8406473	
						PR EXP DATE: 09/30/2020	
						AMOUNT PAID	
						\$ 383.00	

REGISTERED OWNER
LINK SPECTRUM
8221 3RD ST STE 204

DOWNEY
CA 90241

LIEBHOLD



AMOUNT DUE	AMOUNT RECVD
\$ 383.00	CASH :
	CHCK :
	CRDT : 383.00

H01 C37 5T 0038300 0042 CS H01 092920 31 79084B2 571

















EXHIBIT 3

To renew:

COML 06/30/2021 TO 06/30/2022 31 56186R2
P25217

VEHICLE IDENTIFICATION NUMBER

NM0LS7E76E1133270

BODY TYPE MODEL

VN

DATE ISSUED

06/21/2021

REGISTRATION VALID FROM

TYPE

LICENSE NUMBER

CYLS

DATE FIRST SOLD

CLASS

MAKE

FORD

*YR

Yr. Model

00/00/2014

CW

2017

2014

TYPE VEH.

32V

MP

G

AX

2

WC

C

UNLADIENG/CGW

03520

TOTAL FEES PAID

\$255

1900

LINK SPECTRUM
8221 3RD ST STE 204
DOWNEY CA 90241-3735



W0024

L0048

RJ1061820214101

0042

STATE OF CALIFORNIA

DEPARTMENT OF MOTOR VEHICLES

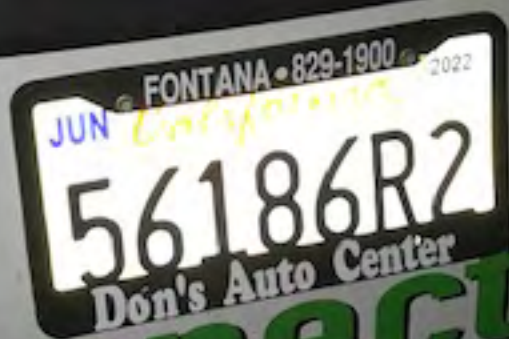
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(800) 983-6150



spectrum

EXHIBIT 4

Fill in this information to identify the case:

Debtor name **Spectrum Link, Inc.**

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA**

Case number (if known) **2:21-bk-16403**

☐ Check if this is an amended filing

Official Form 206A/B Schedule A/B: Assets - Real and Personal Property

12/15

Disclose all property, real and personal, which the debtor owns or in which the debtor has any other legal, equitable, or future interest. Include all property in which the debtor holds rights and powers exercisable for the debtor's own benefit. Also include assets and properties which have no book value, such as fully depreciated assets or assets that were not capitalized. In Schedule A/B, list any executory contracts or unexpired leases. Also list them on *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G).

Be as complete and accurate as possible. If more space is needed, attach a separate sheet to this form. At the top of any pages added, write the debtor's name and case number (if known). Also identify the form and line number to which the additional information applies. If an additional sheet is attached, include the amounts from the attachment in the total for the pertinent part.

For Part 1 through Part 11, list each asset under the appropriate category or attach separate supporting schedules, such as a fixed asset schedule or depreciation schedule, that gives the details for each asset in a particular category. List each asset only once. In valuing the debtor's interest, do not deduct the value of secured claims. See the instructions to understand the terms used in this form.

Part 1: Cash and cash equivalents

1. Does the debtor have any cash or cash equivalents?

☐ No. Go to Part 2.

☒ Yes Fill in the information below.

All cash or cash equivalents owned or controlled by the debtor

Current value of
debtor's interest

3. Checking, savings, money market, or financial brokerage accounts (Identify all)

Name of institution (bank or brokerage firm)

Type of account

Last 4 digits of account
number

3.1. **Chase Bank**

Checking account

3932

\$3,502.00

3.2. **First Bank - Levied funds, see item 11
on A/B**

Checking account

0438

\$0.00

4. Other cash equivalents (Identify all)

5. Total of Part 1.

Add lines 2 through 4 (including amounts on any additional sheets). Copy the total to line 80.

\$3,502.00

Part 2: Deposits and Prepayments

6. Does the debtor have any deposits or prepayments?

☐ No. Go to Part 3.

☒ Yes Fill in the information below.

7. Deposits, including security deposits and utility deposits

Description, including name of holder of deposit

7.1. **Security deposit for office on 3250 Wilshire Blvd.**

\$6,972.53

8. Prepayments, including prepayments on executory contracts, leases, insurance, taxes, and rent

Description, including name of holder of prepayment

Debtor **Spectrum Link, Inc.**
Name

Case number (if known) **2:21-bk-16403**

9. **Total of Part 2.**

Add lines 7 through 8. Copy the total to line 81.

\$6,972.53

Part 3: Accounts receivable

10. Does the debtor have any accounts receivable?

☐ No. Go to Part 4.

☒ Yes Fill in the information below.

11. **Accounts receivable**

11a. 90 days old or less: 39,632.42 - 0.00 = \$39,632.42
face amount doubtful or uncollectible accounts

11a. 90 days old or less: 14,917.00 - 0.00 = \$14,917.00
face amount doubtful or uncollectible accounts

12. **Total of Part 3.**

Current value on lines 11a + 11b = line 12. Copy the total to line 82.

\$54,549.42

Part 4: Investments

13. Does the debtor own any investments?

☒ No. Go to Part 5.

☐ Yes Fill in the information below.

Part 5: Inventory, excluding agriculture assets

18. Does the debtor own any inventory (excluding agriculture assets)?

☐ No. Go to Part 6.

☒ Yes Fill in the information below.

	General description	Date of the last physical inventory	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
19.	Raw materials				
20.	Work in progress				
21.	Finished goods, including goods held for resale				
22.	Other inventory or supplies				

Debtor **Spectrum Link, Inc.**
Name

Case number (If known) **2:21-bk-16403**

30 Siklu wireless radio components that have a total estimated resale value of \$30,000; 50 antennas that have an estimated total value of \$17,500; 200 access points that have an estimated total value of \$40,000; 25 ICX equipment which are used for computer rooms which have an estimated total value of \$22,500; 15 FWS radio components that have an estimated total value of \$4,500; 200 P300 radio components which it uses to extend wireless coverage between remote locations or to enable broadband services in hard-to-reach locations. These P300 radio components have an estimated total value of \$130,000; 80 Micotiks internet equipment that have an estimated total value of \$4,000; Debtor owns approximately 15 sleds with a total value of \$2,750.0

\$0.00

\$251,250.00

23. **Total of Part 5.**

Add lines 19 through 22. Copy the total to line 84.

\$251,250.00

24. **Is any of the property listed in Part 5 perishable?**

- ☒ No
☐ Yes

25. **Has any of the property listed in Part 5 been purchased within 20 days before the bankruptcy was filed?**

☒ No

☐ Yes. Book value _____ Valuation method _____ Current Value _____

26. **Has any of the property listed in Part 5 been appraised by a professional within the last year?**

☒ No

☐ Yes

Part 6: Farming and fishing-related assets (other than titled motor vehicles and land)

27. **Does the debtor own or lease any farming and fishing-related assets (other than titled motor vehicles and land)?**

☒ No. Go to Part 7.

☐ Yes Fill in the information below.

Part 7: Office furniture, fixtures, and equipment; and collectibles

38. **Does the debtor own or lease any office furniture, fixtures, equipment, or collectibles?**

Official Form 206A/B

Schedule A/B Assets - Real and Personal Property

page 3

Debtor **Spectrum Link, Inc.**
Name

Case number (if known) **2:21-bk-16403**

- ☐ No. Go to Part 8.
☒ Yes Fill in the information below.

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
39. Office furniture			
40. Office fixtures			
41. Office equipment, including all computer equipment and communication systems equipment and software 10 lap tops, 2 desk tops, 5 desks, leather sofa (2), television screens, conference tables, microwave, refrigerators, file cabinets. These items are located at 8221 3rd Street and 3250 Wilshire Blvd., #1615	\$0.00		\$15,000.00

42. **Collectibles** *Examples:* Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; china and crystal; stamp, coin, or baseball card collections; other collections, memorabilia, or collectibles

43. Total of Part 7.

Add lines 39 through 42. Copy the total to line 86.

\$15,000.00

44. Is a depreciation schedule available for any of the property listed in Part 7?

- ☒ No
☐ Yes

45. Has any of the property listed in Part 7 been appraised by a professional within the last year?

- ☒ No
☐ Yes

Part 8: Machinery, equipment, and vehicles

46. Does the debtor own or lease any machinery, equipment, or vehicles?

- ☐ No. Go to Part 9.
☒ Yes Fill in the information below.

General description Include year, make, model, and identification numbers (i.e., VIN, HIN, or N-number)	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
47. Automobiles, vans, trucks, motorcycles, trailers, and titled farm vehicles			
47.1. 2017 Ford Connect Van	\$0.00		\$10,000.00
47.2. 2016 F150 Pickup Truck	\$0.00		\$15,000.00
47.3. 2013 Ford Connect Van	\$0.00		\$8,000.00

48. **Watercraft, trailers, motors, and related accessories** *Examples:* Boats, trailers, motors, floating homes, personal watercraft, and fishing vessels

49. **Aircraft and accessories**

Debtor **Spectrum Link, Inc.**
Name

Case number (if known) **2:21-bk-16403**

50. Other machinery, fixtures, and equipment (excluding farm machinery and equipment)

51. Total of Part 8.

Add lines 47 through 50. Copy the total to line 87.

\$33,000.00

52. Is a depreciation schedule available for any of the property listed in Part 8?

- ☒ No
☐ Yes

53. Has any of the property listed in Part 8 been appraised by a professional within the last year?

- ☒ No
☐ Yes

Part 9. Real property

54. Does the debtor own or lease any real property?

- ☒ No. Go to Part 10.
☐ Yes Fill in the information below.

Part 10. Intangibles and intellectual property

59. Does the debtor have any interests in intangibles or intellectual property?

- ☐ No. Go to Part 11.
☒ Yes Fill in the information below.

General description	Net book value of debtor's interest (Where available)	Valuation method used for current value	Current value of debtor's interest
60. Patents, copyrights, trademarks, and trade secrets			
61. Internet domain names and websites			
62. Licenses, franchises, and royalties			
Seller's permit	\$0.00		\$0.00

63. Customer lists, mailing lists, or other compilations

64. Other intangibles, or intellectual property

65. Goodwill

66. Total of Part 10.

Add lines 60 through 65. Copy the total to line 89.

\$0.00

67. Do your lists or records include personally identifiable information of customers (as defined in 11 U.S.C. §§ 101(41A) and 107)?

- ☒ No
☐ Yes

68. Is there an amortization or other similar schedule available for any of the property listed in Part 10?

- ☒ No
☐ Yes

69. Has any of the property listed in Part 10 been appraised by a professional within the last year?

- ☒ No
☐ Yes

Debtor **Spectrum Link, Inc.**
Name

Case number (if known) **2:21-bk-16403**

Part 11: All other assets

70. Does the debtor own any other assets that have not yet been reported on this form?

Include all interests in executory contracts and unexpired leases not previously reported on this form.

☐ No. Go to Part 12.

☒ Yes Fill in the information below.

Current value of
debtor's interest

71. **Notes receivable**
Description (include name of obligor)
72. **Tax refunds and unused net operating losses (NOLs)**
Description (for example, federal, state, local)
73. **Interests in insurance policies or annuities**
74. **Causes of action against third parties (whether or not a lawsuit has been filed)**
Debtor has a potential claim against the Estate of
Bernard Mayfield, Probate Case No.:
30-2021-01198605-PR-LA-CJC
- | | |
|------------------|---------------------|
| Nature of claim | <u>Embezzlement</u> |
| Amount requested | <u>\$0.00</u> |

Unknown

75. **Other contingent and unliquidated claims or causes of action of every nature, including counterclaims of the debtor and rights to set off claims**
76. **Trusts, equitable or future interests in property**
77. **Other property of any kind not already listed Examples:** Season tickets, country club membership

78. Total of Part 11.

Add lines 71 through 77. Copy the total to line 90.

\$0.00

79. Has any of the property listed in Part 11 been appraised by a professional within the last year?

☒ No

☐ Yes

Debtor **Spectrum Link, Inc.**
Name

Case number (If known) **2:21-bk-16403**

Part 12: Summary

In Part 12 copy all of the totals from the earlier parts of the form

Type of property	Current value of personal property	Current value of real property
80. Cash, cash equivalents, and financial assets. Copy line 5, Part 1	\$3,502.00	
81. Deposits and prepayments. Copy line 9, Part 2.	\$6,972.53	
82. Accounts receivable. Copy line 12, Part 3.	\$54,549.42	
83. Investments. Copy line 17, Part 4.	\$0.00	
84. Inventory. Copy line 23, Part 5.	\$251,250.00	
85. Farming and fishing-related assets. Copy line 33, Part 6.	\$0.00	
86. Office furniture, fixtures, and equipment; and collectibles. Copy line 43, Part 7.	\$15,000.00	
87. Machinery, equipment, and vehicles. Copy line 51, Part 8.	\$33,000.00	
88. Real property. Copy line 56, Part 9.....>		\$0.00
89. Intangibles and intellectual property. Copy line 66, Part 10.	\$0.00	
90. All other assets. Copy line 78, Part 11.	+ \$0.00	
91. Total. Add lines 80 through 90 for each column	\$364,273.95	+ 91b. \$0.00
92. Total of all property on Schedule A/B. Add lines 91a+91b=92		\$364,273.95

EXHIBIT 5

Fill in this information to identify the case:

Debtor name **Spectrum Link, Inc.**

United States Bankruptcy Court for the: **CENTRAL DISTRICT OF CALIFORNIA**

Case number (if known) **2:21-bk-16403**

☐ Check if this is an amended filing

Official Form 206D

Schedule D: Creditors Who Have Claims Secured by Property

12/15

Be as complete and accurate as possible.

1. Do any creditors have claims secured by debtor's property?

- ☐ No. Check this box and submit page 1 of this form to the court with debtor's other schedules. Debtor has nothing else to report on this form.
- ☒ Yes. Fill in all of the information below.

Part 1: List Creditors Who Have Secured Claims

2. List in alphabetical order all creditors who have secured claims. If a creditor has more than one secured claim, list the creditor separately for each claim.

	Column A Amount of claim Do not deduct the value of collateral.	Column B Value of collateral that supports this claim
2.1 Employee Development Department Creditor's Name Bankruptcy Group MIC 92E PO Box 826880 Sacramento, CA 94280-0001 Creditor's mailing address Creditor's email address, if known Date debt was incurred 6/11/2021 Last 4 digits of account number 4825 Do multiple creditors have an interest in the same property? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Specify each creditor, including this creditor and its relative priority.	Describe debtor's property that is subject to a lien Describe the lien State Tax Lien Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H) As of the petition filing date, the claim is: Check all that apply <input type="checkbox"/> Contingent <input type="checkbox"/> Unliquidated <input type="checkbox"/> Disputed	\$3,418.67 \$0.00

2.2 Employee Development Department Creditor's Name Bankruptcy Group MIC 92E PO Box 826880 Sacramento, CA 94280-0001 Creditor's mailing address Creditor's email address, if known Date debt was incurred 7/21/2020 Last 4 digits of account number	Describe debtor's property that is subject to a lien Describe the lien State Tax Lien Is the creditor an insider or related party? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes Is anyone else liable on this claim? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Fill out <i>Schedule H: Codebtors</i> (Official Form 206H)	\$1,061.63 \$0.00
---	--	--

Debtor **Spectrum Link, Inc.**
Name

Case number (if known) **2:21-bk-16403**

3420

Do multiple creditors have an interest in the same property?

☒ No

☐ Yes. Specify each creditor, including this creditor and its relative priority.

As of the petition filing date, the claim is:

Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

2.3 Employee Development Department

Creditor's Name

**Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA
94280-0001**

Creditor's mailing address

Creditor's email address, if known

Date debt was incurred

09/02/2020

Last 4 digits of account number

0926

Do multiple creditors have an interest in the same property?

☒ No

☐ Yes. Specify each creditor, including this creditor and its relative priority.

Describe debtor's property that is subject to a lien

\$1,182.73

\$0.00

Describe the lien

State Tax Lien

Is the creditor an insider or related party?

☒ No

☐ Yes

Is anyone else liable on this claim?

☒ No

☐ Yes. Fill out *Schedule H: Codebtors* (Official Form 206H)

As of the petition filing date, the claim is:

Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

2.4 Employee Development Department

Creditor's Name

**Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA
94280-0001**

Creditor's mailing address

Creditor's email address, if known

Date debt was incurred

10/30/2020

Last 4 digits of account number

9437

Do multiple creditors have an interest in the same property?

☒ No

☐ Yes. Specify each creditor, including this creditor and its relative priority.

Describe debtor's property that is subject to a lien

\$1,873.79

\$0.00

Describe the lien

State Tax Lien

Is the creditor an insider or related party?

☒ No

☐ Yes

Is anyone else liable on this claim?

☒ No

☐ Yes. Fill out *Schedule H: Codebtors* (Official Form 206H)

As of the petition filing date, the claim is:

Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

2.5 The 3250 Wilshire Blvd. Partners

Describe debtor's property that is subject to a lien

\$25,147.39

\$0.00

Debtor **Spectrum Link, Inc.**
Name

Case number (if known) **2:21-bk-16403**

Creditor's Name

**c/o Steven J. Revitz
Raiskin & Revitz
1875 Century Park East,
Ste 2000
Los Angeles, CA 90067**

Creditor's mailing address

**All property subject to enforcement of a
Money Judgment against Judgment Debtor**

Describe the lien

**Judgment Lien Recorded with SOS within 90
day preference**

Is the creditor an insider or related party?

☒ No

☐ Yes

Is anyone else liable on this claim?

☒ No

☐ Yes. Fill out *Schedule H: Codebtors* (Official Form 206H)

Creditor's email address, if known

Date debt was incurred

5/23/2021

Last 4 digits of account number

0096

Do multiple creditors have an
interest in the same property?

☒ No

☐ Yes. Specify each creditor,
including this creditor and its relative
priority.

As of the petition filing date, the claim is:
Check all that apply

☐ Contingent

☐ Unliquidated

☐ Disputed

3. Total of the dollar amounts from Part 1, Column A, including the amounts from the Additional Page, if any.

\$32,684.21

Part 2: List Others to Be Notified for a Debt Already Listed in Part 1

List in alphabetical order any others who must be notified for a debt already listed in Part 1. Examples of entities that may be listed are collection agencies, assignees of claims listed above, and attorneys for secured creditors.

If no others need to be notified for the debts listed in Part 1, do not fill out or submit this page. If additional pages are needed, copy this page.

Name and address

On which line in Part 1 did
you enter the related creditor?

Last 4 digits of
account number for
this entity

**Law Office of Sheila M. Pistone
One Park Plaza, Suite 600 PMB 150
Irvine, CA 92614**

Line **2.5**

EXHIBIT 6



1 OF 6 RECORD(S)

UCC Filings

1:CALIFORNIA UCC Record

Debtor Information

Name: SPECTRUM LINK, INC.
Standardized Address: 8221 3RD ST STE 204
DOWNEY, CA 90241

Original Address: 8221 3RD ST STE 204
DOWNEY, CA 90241-3735

Secured Party Information

Name: EMPLOYMENT DEVELOPMENT DEPARTMENT
Standardized Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814

Original Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814-4703

Filing Information

Original Filing Type: NOTICE OF STATE TAX LIEN - LIEN FINANCIN
Original Filing Number: U210055604825
Original Filing Date: 06/11/2021
Original Filing Time: 9:11 PM

Filing Number: U210055604825
Filing Expiration Date: 06/11/2031
Filing Status: ACTIVE
Pages: 1

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2 OF 6 RECORD(S)

UCC Filings

1:CALIFORNIA UCC Record

Debtor Information

Name: SPECTRUM LINK, INC.
Standardized Address: 8221 3RD ST STE 204
DOWNEY, CA 90241
Original Address: 8221 3RD ST STE 204
DOWNEY, CA 90241-3735

Secured Party Information

Name: EMPLOYMENT DEVELOPMENT DEPARTMENT
Standardized Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814
Original Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814-4703

Filing Information

Original Filing Type: NOTICE OF STATE TAX LIEN - LIEN FINANCIN
Original Filing Number: U200028939437
Original Filing Date: 10/30/2020
Original Filing Time: 10:27 PM
Filing Number: U200028939437
Filing Expiration Date: 10/30/2030
Filing Status: ACTIVE
Pages: 1

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3 OF 6 RECORD(S)

UCC Filings

1:CALIFORNIA UCC Record

Debtor Information

Name: SPECTRUM LINK, INC.
Standardized Address: 8221 3RD ST STE 204
DOWNEY, CA 90241
Original Address: 8221 3RD ST STE 204
DOWNEY, CA 90241-3735

Secured Party Information

Name: EMPLOYMENT DEVELOPMENT DEPARTMENT
Standardized Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814
Original Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814-4703

Filing Information

Original Filing Type: NOTICE OF STATE TAX LIEN - LIEN FINANCIN
Original Filing Number: U200003153420
Original Filing Date: 07/21/2020
Original Filing Time: 01:22 AM
Filing Number: U200003153420
Filing Expiration Date: 07/21/2030
Filing Status: ACTIVE
Pages: 1

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4 OF 6 RECORD(S)

UCC Filings

1:CALIFORNIA UCC Record

Debtor Information

Name: SPECTRUM LINK, INC.
Standardized Address: 8221 3RD ST STE 204
DOWNEY, CA 90241
Original Address: 8221 3RD ST STE 204
DOWNEY, CA 90241-3735

Secured Party Information

Name: EMPLOYMENT DEVELOPMENT DEPARTMENT
Standardized Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814
Original Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814-4703

Filing Information

Original Filing Type: STATE TAX LIEN
Original Filing Number: 197733060016
Original Filing Date: 09/10/2019
Original Filing Time: 3:38 PM

Filing Expiration Date: 09/10/2029
Filing Status: ACTIVE

Filing Type: TERMINATION
Filing Number: 1977474651
Filing Date: 11/19/2019
Filing Time: 15:28
Filing Expiration Date: 09/10/2029
Filing Status: ACTIVE
Pages: 1
Microfilm Number: 83794600002

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5 OF 6 RECORD(S)

UCC Filings

1:CALIFORNIA UCC Record

Debtor Information

Name: SPECTRUM LINK, INC.
Standardized Address: 8221 3RD ST STE 204
DOWNEY, CA 90241
Original Address: 8221 3RD ST STE 204
DOWNEY, CA 90241-3735

Secured Party Information

Name: EMPLOYMENT DEVELOPMENT DEPARTMENT
Standardized Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814
Original Address: 722 CAPITOL MALL
SACRAMENTO, CA 95814-4703

Filing Information

Original Filing Type: STATE TAX LIEN
Original Filing Number: 197721793521
Original Filing Date: 07/08/2019
Original Filing Time: 3:28 PM

Filing Expiration Date: 07/08/2029
Filing Status: ACTIVE

Filing Type: TERMINATION
Filing Number: 1977291921
Filing Date: 08/21/2019
Filing Time: 15:41
Filing Expiration Date: 07/08/2029
Filing Status: ACTIVE
Microfilm Number: 81101160002

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accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State.

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6 OF 6 RECORD(S)

UCC Filings

1:CALIFORNIA UCC Record

Debtor Information

Debtor 1

Name: MR BERNARD SMITH MAYFIELD
Standardized Address: 4654 PIMENTA AVE
LAKEWOOD, CA 90712

Original Address: 4654 PIMENTA
LAKEWOOD, CA 90712-3866

SSN: 202-50-XXXX

Debtor 2

Name: SPECTRUM LINK, INC., A CALIFORNIA CORPORATION
Standardized Address: 4654 PIMENTA AVE
LAKEWOOD, CA 90712

Original Address: 4654 PIMENTA
LAKEWOOD, CA 90712-3866

Secured Party Information

Name: THE 3250 WILSHIRE BLVD. PARTNERS, A CALIFORNIA LIMITED
PARTNERSHIP
Standardized Address: 1875 CENTURY PARK E STE 2000
LOS ANGELES, CA 90067
Original Address: C/O RAISKIN & REVITZ 1875 CENTURY PARK EAST SUITE 2000 STEVE
LOS ANGELES, CA 90067-2545

Filing Information

Original Filing Type: JUDGMENT LIEN - LIEN FINANCING STMT
Original Filing Number: U210048992644
Original Filing Date: 05/23/2021
Original Filing Time: 2:18 PM

Filing Number: U210048992644
Filing Expiration Date: 05/23/2026
Filing Status: ACTIVE
Pages: 2

UCC Filings

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State.

Your DPPA Permissible Use: Litigation

Your GLBA Permissible Use: Legal Compliance

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End of Document

EXHIBIT 7

Fill in this information to identify the case:

Debtor 1 SPECTRUM LINK, INC.

Debtor 2 _____

(Spouse, if filing)

United States Bankruptcy Court for the: CENTRAL District of CALIFORNIA

Case number 21-16403

Official Form 410

Proof of Claim

12/15

Read the instructions before filing out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	EMPLOYMENT DEVELOPMENT DEPARTMENT Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? EMPLOYMENT DEVELOPMENT DEPARTMENT Bankruptcy Group MIC 92E PO Box 826880 Sacramento, CA 94280-0001 Contact phone 1-916-464-2888 Contact email CDBankruptcyGroup.Tax@edd.ca.gov Uniform claim identified for electronic payments in chapter 13 (if you use one): -----	Where should payments to the creditor be sent? (if different) _____ _____ _____ Contact phone _____ Contact email _____
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on: _____ MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?	
<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: XXXX-XXX5968
7. How much is the claim? <u>\$17,507.94</u> Does this amount include interest or other charges?	
<input type="checkbox"/> No	
<input checked="" type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).	
8. What is the basis of the claim?	
Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.	
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).	
Limit disclosing information that is entitled to privacy, such as health care information.	
Taxes _____	
9. Is all or part of the claim secured?	
<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes. The claim is secured by a lien on property.
Nature of property:	
<input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> .	
<input type="checkbox"/> Motor vehicle	
<input type="checkbox"/> Other. Describe: _____	
Basis for perfection: _____	
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)	
Value of property:	<u>\$0.00</u>
Amount of the claim that is secured:	<u>\$0.00</u>
Amount of the claim that is unsecured:	<u>\$0.00</u> (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: <u>\$0.00</u>	
Annual Interest Rate (when case was filed) <u>0.00%</u>	
<input type="checkbox"/> Fixed	
<input type="checkbox"/> Variable	
10. Is this claim based on a lease?	
<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. _____
11. Is this claim subject to a right of setoff?	
<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ No

☒ Yes. *Check all that apply:*

	Amount entitled to priority
<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	\$ 0.00
<input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ 0.00
<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ 0.00
<input checked="" type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ 12,519.13
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ 0.00
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.	\$ 0.00

* Amounts are subject to adjustment on 4/01/16 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☒ I am the creditor.
- ☐ I am the creditor's attorney or authorized agent.
- ☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- ☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date September 27, 2021
MM / DD / YYYY

/s/ MARY HERRICK
Signature

Print the name of the person who is completing and signing this claim:

Name MARY HERRICK
First name Middle name Last name

Title Tax Administrator

Company EMPLOYMENT DEVELOPMENT DEPARTMENT
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address Bankruptcy Group MIC 92E
PO Box 826880
Sacramento, CA 94280-0001

Contact phone 1-916-464-2888 Email CDBankruptcyGroup.Tax@edd.ca.gov

Employment Development Department (EDD)

Summary Itemization of Proof of Claim

Petition Date: 08/11/21

In the Matter of: SPECTRUM LINK, INC.

EDD Identification Number(s):
XXXX-XXX5968

This claim is based on unpaid California payroll taxes under Section 507(a)(8) (C) of the United States Bankruptcy Code (USBC) for State Disability Insurance (SDI) and State Personal Income Tax (PIT) withholdings (trust funds) and Section 507(a)(8) (E) for Unemployment Insurance (UI) and Employment Training Tax (ETT) (non-trust-funds).

Priority Claims under Section 507(a)(8) of the Bankruptcy Code

EDD Account No.	Tax Period	507(a)(8)(C) Taxes	507(a)(8)(E) Taxes	Interest Date To 08/11/21	Account Total
XXX-7372-X	4/1/2021 To 6/30/2021	\$502.76	\$1,112.51	\$1.20	\$1,616.47
XXX-7372-X	1/1/2021 To 3/31/2021	\$522.14	\$1,104.50	\$13.83	\$1,640.47
XXX-7372-X	10/1/2020 To 12/31/2020	\$535.99	\$1,551.80	\$33.04	\$2,120.83
XXX-7372-X	7/1/2020 To 9/30/2020	\$672.65	\$1,870.86	\$68.01	\$2,611.52
XXX-7372-X	4/1/2020 To 6/30/2020	\$555.51	\$1,451.14	\$80.29	\$2,086.94
XXX-7372-X	1/1/2020 To 3/31/2020	\$213.94	\$1,176.69	\$73.93	\$1,464.56
XXX-7372-X	10/1/2019 To 12/31/2019	\$261.08	\$621.75	\$58.44	\$941.27
XXX-7372-X	7/1/2019 To 9/30/2019	\$0.00	\$0.00	\$37.07	\$37.07
Total Amount of Priority Claims					\$12,519.13

Unsecured Claims

1) Penalty to 08/11/21.	\$4,867.22
2) Interest not included in the priority claim.	\$121.59
3) Non-Priority USBC Section 507(a)(8)(E) Unemployment Insurance and/or Employment Training Tax (ETT).	\$0.00
4) Overpayment of Unemployment Insurance and/or Disability Insurance Benefits for which this Debtor is liable under Section(s) 1375/2735 of the California Unemployment Insurance Code.	\$0.00
Total Amount of Unsecured Claims	\$4,988.81

Note: Interest continues to accrue on all amounts included in this claim until paid or discharged.

Claim Total **\$17,507.94**

EXHIBIT 8



2017 Ford Transit Connect Cargo Pricing Report

Style: XLT Van 4D

Mileage: 119,529

KBB.com Consumer Rating: 4.3/5

Vehicle Highlights

Fuel Economy: City 20/Hwy 27/Comb 23 MPG

Engine: 4-Cyl, Flex Fuel, 2.5 Liter

Drivetrain: FWD

Transmission: Automatic, 6-Spd w/SelectShift

Country of Assembly: Spain

Country of Origin: United States

EPA Class: Special Purpose Vehicles

Max Seating: 2

Doors: 4

Body Style: Van

Sell to Private Party

Private Party Range
\$10,940 - \$13,826
Private Party Value
\$12,687



Valid for **ZIP code 90071** through **01/04/2022**

Your Configured Options

Our pre-selected options, based on typical equipment for this car.

✓ Options that you added while configuring this car.

Exterior Color

✓ Black

Engine

4-Cyl, Flex Fuel, 2.5 Liter

Drivetrain

FWD

Transmission

Automatic, 6-Spd
w/SelectShift

Braking and Traction

ABS (4-Wheel)

Hill Start Assist Control

Electronic Stability Control

Comfort and Convenience

Air Conditioning

Perimeter Alarm System

Cruise Control

Keyless Entry

Power Door Locks

Power Windows

Entertainment and Instrumentation

AM/FM Stereo

CD/MP3 (Single Disc)

SYNC

SiriusXM Satellite

Safety and Security

Dual Air Bags

Head Curtain Air Bags

Side Air Bags

Steering

Power Steering

Tilt Wheel

Wheels and Tires

Steel Wheels

Exterior

Fog Lights



2012 Ford F150 Super Cab Pricing Report

Style: XL Pickup 4D 6 1/2 ft

Mileage: 146,996

KBB.com Consumer Rating: 4.6/5

Vehicle Highlights

Fuel Economy: City 15/Hwy 21/Comb 17 MPG

Engine: V8, Flex Fuel, 5.0 Liter

Transmission: Automatic, 6-Spd

Drivetrain: 2WD

Country of Assembly: United States

Country of Origin: United States

EPA Class: Standard Pickup Trucks

Max Seating: 6

Doors: 4

Body Style: Pickup

Sell to Private Party

Private Party Range
\$8,048 - \$10,605

Private Party Value
\$9,327



Valid for **ZIP code 90071** through **01/04/2022**

Your Configured Options

Our pre-selected options, based on typical equipment for this car.

✓ Options that you added while configuring this car.

Exterior Color

✓ Black

Engine

V8, Flex Fuel, 5.0 Liter

Transmission

Automatic, 6-Spd

Drivetrain

2WD

Braking and Traction

Hill Start Assist Control

Traction Control

AdvanceTrac

ABS (4-Wheel)

Comfort and Convenience

Air Conditioning

Power Windows

Power Door Locks

Cruise Control

Alarm System

Steering

Power Steering

Tilt Wheel

Entertainment and Instrumentation

AM/FM Stereo

Safety and Security

Dual Air Bags

Side Air Bags

Head Curtain Air Bags

Cargo and Towing

Towing Pkg

Wheels and Tires

Steel Wheels



2014 Ford Transit Connect Cargo Pricing Report

Style: XL Van 4D

Mileage: 146,000

Vehicle Highlights

Fuel Economy: City 21/Hwy 29/Comb 24 MPG

Engine: 4-Cyl, 2.5 Liter

Transmission: Automatic, 6-Spd w/SelectShift

Drivetrain: FWD

Country of Assembly: Spain

Country of Origin: United States

EPA Class: Special Purpose Vehicles

Max Seating: 2

Doors: 4

Body Style: Van

Sell to Private Party

Private Party Range
\$6,682 - \$8,579

Private Party Value
\$7,631



Valid for **ZIP code 90071** through **01/04/2022**

Your Configured Options

Our pre-selected options, based on typical equipment for this car.

✓ Options that you added while configuring this car.

Exterior Color

✓ Black

Engine

4-Cyl, 2.5 Liter

Transmission

Automatic, 6-Spd
w/SelectShift

Drivetrain

FWD

Wheels and Tires

Steel Wheels

Braking and Traction

Hill Start Assist

Stability Control

ABS (4-Wheel)

Comfort and Convenience

Keyless Entry

Air Conditioning

Power Windows

Power Door Locks

Cruise Control

Anti-Theft System

Steering

Power Steering

Tilt Wheel

Entertainment and Instrumentation

AM/FM Stereo

Safety and Security

Dual Air Bags

Side Air Bags

Head Curtain Air Bags

Glossary of Terms

Kelley Blue Book® Trade-In Value - This is the amount you can expect to receive when you trade in your car to a dealer. This value is determined based on the style, condition, mileage and options indicated.

Trade-In Range - The Trade-In Range is Kelley Blue Book's estimate of what you can reasonably expect to receive this week based on the style, condition, mileage and options of your vehicle when you trade it in to a dealer. However, every dealer is different and values are not guaranteed.

Kelley Blue Book® Private Party Value - This is the starting point for negotiation of a used-car sale between a private buyer and seller. This is an "as is" value that does not include any warranties. The final price depends on the car's actual condition and local market factors.

Private Party Range - The Private Party Range is Kelley Blue Book's estimate of what you can reasonably expect to receive this week for a vehicle with stated mileage in the selected condition and configured with your selected options, excluding taxes, title and fees when selling to a private party.

Excellent Condition - 3% of all cars we value. This car looks new and is in excellent mechanical condition. It has never had paint or bodywork and has an interior and body free of wear and visible defects. The car is rust-free and does not need reconditioning. Its clean engine compartment is free of fluid leaks. It also has a clean title history, has complete and verifiable service records and will pass safety and smog inspection.

Very Good Condition - 23% of all cars we value. This car has minor wear or visible defects on the body and interior but is in excellent mechanical condition, requiring only minimal reconditioning. It has little to no paint and bodywork and is free of rust. Its clean engine compartment is free of fluid leaks. The tires match and have 75% or more of tread. It also has a clean title history, with most service records available, and will pass safety and smog inspection.

Good Condition - 54% of all cars we value. This car is free of major mechanical problems but may need some reconditioning. Its paint and bodywork may require minor touch-ups, with repairable cosmetic defects, and its engine compartment may have minor leaks. There are minor body scratches or dings and minor interior blemishes, but no rust. The tires match and have 50% or more of tread. It also has a clean title history, with some service records available, and will pass safety and smog inspection.

Fair Condition - 18% of all cars we value. This car has some mechanical or cosmetic defects and needs servicing, but is still in safe running condition and has a clean title history. The paint, body and/or interior may need professional servicing. The tires may need replacing and there may be some repairable rust damage.

Tip:

It's crucial to know your car's true condition when you sell it, so that you can price it appropriately. Consider having your mechanic give you an objective report.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 333 South Grand Avenue, Suite 3400, Los Angeles, CA 90071.

A true and correct copy of the foregoing document entitled (*specify*): CHAPTER 7 TRUSTEE'S MOTION FOR ORDER: (1) AUTHORIZING SALE OF VEHICLES TO MARILYN ADJANGBA, SUBJECT TO OVERBID; (2) APPROVING PROPOSED OVERBID PROCEDURES; (3) APPROVING THE SALE FREE AND CLEAR OF ANY LIENS, INTERESTS, AND ENCUMBRANCES UNDER 11 U.S.C. § 363(f), (4) DEEMING THE BUYER TO BE A GOOD FAITH PURCHASER UNDER 11 U.S.C. § 363(m); AND (5) WAIVING THE FOURTEEN-DAY STAY PRESCRIBED BY FRBP 6004(h); MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATIONS OF HOWARD M. EHRENBURG AND MARILYN ADJANGBA IN SUPPORT THEREOF will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) January 4, 2022 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Michael Jay Berger on behalf of Debtor Spectrum Link, Inc.
michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com;michael.berger@ecf.inforuptcy.com

Steve Burnell on behalf of Attorney SulmeyerKupetz, A Professional Corporati
sburnell@sulmeyerlaw.com,
sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;mviramontes@sulmeyerlaw.com

Steve Burnell on behalf of Interested Party Courtesy (NEF)
sburnell@sulmeyerlaw.com,
sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;mviramontes@sulmeyerlaw.com

Steve Burnell on behalf of Trustee Howard M Ehrenberg (TR)
sburnell@sulmeyerlaw.com,
sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;mviramontes@sulmeyerlaw.com

Charles W Daff on behalf of Interested Party Rosalina Frank
charleswdaff@gmail.com, r53975@notify.bestcase.com

Howard M Ehrenberg (TR)
ehrenbergtrustee@sulmeyerlaw.com, ca25@ecfcbis.com;C123@ecfcbis.com;hehrenberg@ecf.inforuptcy.com

M Douglas Flahaut on behalf of Interested Party Courtesy NEF
flahaut.douglas@arentfox.com

Alan W Forsley on behalf of Creditor Kenneth Thieman
alan.forsley@flpllp.com, awf@fklawfirm.com,awf@fl-lawyers.net,addy.flores@flpllp.com

Alan W Forsley on behalf of Interested Party Courtesy (NEF)
alan.forsley@flpllp.com, awf@fklawfirm.com,awf@fl-lawyers.net,addy.flores@flpllp.com

M. Jonathan Hayes on behalf of Interested Party Courtesy NEF
jhayes@rhmfirm.com,
roksana@rhmfirm.com;matt@rhmfirm.com;rosario@rhmfirm.com;pardis@rhmfirm.com;russ@rhmfirm.com;david@rhmfirm.com;sloan@rhmfirm.com;boshra@rhmfirm.com;rosario@rhmfirm.com

Mark S Horoupian on behalf of Trustee Howard M Ehrenberg (TR)
mhoroupian@sulmeyerlaw.com, mhoroupian@ecf.inforuptcy.com;ccaldwell@sulmeyerlaw.com

Kathleen P March on behalf of Creditor R and A Cell Towers LLC
kmarch@bkylawfirm.com, kmarch3@sbcglobal.net,kmarch@sbcglobal.net

Kathleen P March on behalf of Interested Party Courtesy (NEF)
kmarch@bkylawfirm.com, kmarch3@sbcglobal.net, kmarch@sbcglobal.net

Kelly L Morrison on behalf of U.S. Trustee United States Trustee (LA)
kelly.l.morrison@usdoj.gov

Sheila M Pistone on behalf of Creditor The 3250 Wilshire Boulevard Partners
sheila@pistonelawoffice.com, sheilapistone@yahoo.com

Thomas J Polis on behalf of Creditor Armstrong Family Trust
tom@polis-law.com, paralegal@polis-law.com; r59042@notify.bestcase.com

Allan D Sarver on behalf of Interested Party Allan Sarver
ADS@asarverlaw.com

Timothy J Silverman on behalf of Creditor FERRARI FINANCIAL SERVICES, INC., its successors and/or assignees
tsilverman@scheerlawgroup.com, tsilverman1@ecf.courtdrive.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov

Christopher B Wick on behalf of Creditor Crown Castle MU LLC
cwick@hahnlaw.com, lmay@hahnlaw.com; cmb@hahnlaw.com

Christopher B Wick on behalf of Interested Party Courtesy NEF
cwick@hahnlaw.com, lmay@hahnlaw.com; cmb@hahnlaw.com

Christopher K.S. Wong on behalf of Creditor Firuza Gilcher
christopher.wong@arentfox.com, yvonne.li@arentfox.com

Gabe P Wright on behalf of Creditor Crown Castle MU LLC
GWRIGHT@hahnlaw.COM, mkanamori@hahnlaw.com; lmay@hahnlaw.com

Gabe P Wright on behalf of Interested Party Courtesy NEF
GWRIGHT@hahnlaw.COM, mkanamori@hahnlaw.com; lmay@hahnlaw.com

☐ Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (date) January 4, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor

Spectrum Link, Inc.
8221 3rd Street, Suite 204
Downey, CA 90241

United States Trustee (LA)

Kelly L Morrison
Office of the US Trustee
915 Wilshire Blvd., Ste. 1850
Los Angeles, CA 90017

☐ Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) January 4, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent P. Zurzolo
U.S. Bankruptcy Court
Roybal Federal Building
Bin outside of Suite 1360
255 E. Temple Street
Los Angeles, CA 90012-3332

☐ Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>January 4, 2022</u>	<u>Maria R. Viramontes</u>	<u>/s/Maria R. Viramontes</u>
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>